

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,
v.

STMICROELECTRONICS N.V.,
STMICROELECTRONICS
INTERNATIONAL N.V., and
STMICROELECTRONICS, INC,

Defendants.

CIVIL ACTION NO. 6:21-CV-00727-ADA

JURY TRIAL DEMANDED

AFFIDAVIT OF MICHAEL W. SHORE

I, Michael W. Shore, hereby declare as follows:

1. I am a founder of and partner at Shore Chan LLP (“Shore Chan”) and lead counsel of record for Plaintiff The Trustees of Purdue University (“Purdue”) in the above-captioned matter. I am over the age of 21 years and have never been charged with or convicted of a crime or offense involving moral turpitude. I am of sound mind and am otherwise competent to testify about the facts set forth in this Affidavit. The facts stated in this Affidavit are true and correct and within my personal knowledge.

2. I have been a member in continuous good standing with the State Bar of Texas since 1990. I received a J.D. *cum laude* from Southern Methodist University Dedman School of Law and a B.A. in History and B.B.A from Southern Methodist University. Prior to founding Shore Chan, I was a partner at Akin Gump Strauss Hauer & Feld LLP. Since 1990, I have practiced in the areas of intellectual property commercialization and business litigation in state and federal courts across the U.S.

3. Samuel E. Joyner is a former partner of Shore Chan. He has been a member in continuous good standing with the State Bar of Texas since 2002. Mr. Joyner received his J.D.

magna cum laude from the University of Tulsa College of Law and a B.S. in Systems Engineering from the United States Military Academy at West Point. Since 2002, he has practiced in the fields of breach of contract, fraud, unfair competition, infringement, theft of trade secrets, antitrust, RICO, and regulatory compliance. Before practicing law, Mr. Joyner served in the United States Army as an infantry officer.

4. Halima Ndai is an associate attorney at Shore Chan. She has been a member in continuous good standing with the State Bar of Texas since 2017. Ms. Ndai received her J.D. from Pennsylvania State University, Dickinson School of Law and B.S. in Biochemistry from Western Washington University. Since 2017, she has focused primarily on matters relating to patent and commercial litigation. Ms. Ndai is also registered to practice before the United States Patent and Trademark Office.

5. Alicia Cary-Howell is a paralegal at Shore Chan. She received a B.A. from the University of North Texas in 2003 and a paralegal certificate from Collin College in 2005. Ms. Cary-Howell began working at Shore Chan in 2005 and has been involved in litigations throughout the United States, including trials in federal courts in the Western District of Texas, Eastern District of Texas, and the District of Massachusetts.

6. Rhonda Polvado is a paralegal at Shore Chan. She received her Paralegal Certificate from the University of Texas at Arlington in 1984. Since 1984, Ms. Polvado has participated in numerous state and federal trials, has been involved in antitrust litigation, complex commercial litigation, securities litigation, and patent litigation. She has been a full-time employee of Shore Chan since 2012.

7. The hourly rates sought for this matter for the time incurred are as follows:

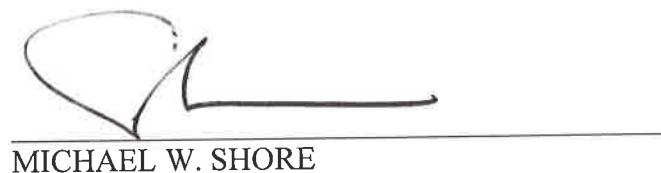
- a. Alfonso G. Chan \$700.00
- b. Samuel E. Joyner \$675.00
- c. Halima Ndai \$425.00
- d. Alicia Cary-Howell \$200.00

e. Rhonda K. Polvado \$200.00

8. In my opinion, these hourly rates are reasonable and customary for attorneys and paralegals having the education, experience, and qualifications in this field. Attached hereto as Exhibit A is a detailed listing of reasonable attorneys' fees attributable to Purdue's efforts to serve Defendant STMicroelectronics International N.V. through the Hague Convention in this case.

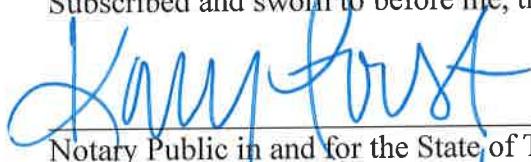
9. In addition to the attorney time above, Shore Chan incurred charges totaling \$10,295.00 directly related to this matter.

FURTHER AFFIANT SAYETH NOT.

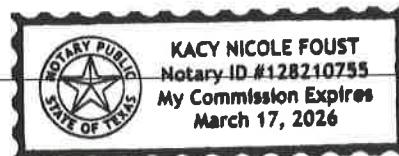


MICHAEL W. SHORE

Subscribed and sworn to before me, the undersigned notary public, on May 25, 2022.


Kacy Foust
Notary Public in and for the State of Texas

Stamp



My Commission Expires: 3/17/26